

PHILIP GARRETT PANITZ, CA State Bar No. 096561
BARBARA E. LUBIN, CA State Bar No. 238283
JEFFREY G. SLOANE, NV State Bar No. 784
PANITZ & KOSOFF, LLP
5743 Corsa Avenue, Suite 208
Westlake Village, CA 91362
Telephone: (805) 379-1667
Facsimile: (805) 379-1668
E-mail: pgp@pktaxlaw.com / bel@pktaxlaw.com

Attorneys for Plaintiffs and Counterclaim Defendants
Michael F. Reeder and Pamela O'Keefe,
Trustee for the Jordan Grace Reeder Irrevocable Trust
and Trustee for the Darby Leigh Reeder Irrevocable Trust

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA, NORTHERN DIVISION

MICHAEL F. REEDER.

Plaintiff,

V.

UNITED STATES OF AMERICA,
Defendant.

PAMELA M. O'KEEFE, as
Trustee for the JORDAN
GRACE REEDER
IRREVOCABLE TRUST,

Plaintiff,

V.

UNITED STATES OF
AMERICA,
Defendant.

Civil No.: 3:15-cv-00129-MMD
WGC

**JOINT STIPULATION TO
EXTEND THE BRIEFING
SCHEDULE FOR THE UNITED
STATES' MOTION FOR
SUMMARY JUDGMENT;
[PROPOSED] ORDER**

1 AND RELATED
2 COUNTERCLAIMS

3 COMES now Plaintiffs and Counterclaim Defendants Michael F. Reeder
4 (“Reeder”) and Pamela O’Keefe, as Trustee of the Jordan Grace Reeder
5 Irrevocable Trust, dated April 15, 1993 (“JGR Trust”) and the Darby Leigh Reeder
6 Irrevocable Trust (“DLR Trust”), Defendant and Counterclaimant, United States of
7 America (“United States”), by and through their undersigned counsel, and submit a
8 joint stipulation to extend the briefing dates with respect to the Motion for
9 Summary Judgment which was refiled by the United States of America (“United
10 States”) with this Court on April 15, 2019 [ECF 84].

11 The Motion for Summary Judgment was originally filed on May 1, 2018
12 [ECF 65]. Meanwhile, Plaintiffs and Counterclaim Defendants submitted a global
13 settlement offer to the government. Formal consideration of the offer by the
14 government was ongoing until approximately April 15, 2019. Upon the tentative
15 rejection of the global settlement offer, the government refiled its Motion for
16 Summary Judgment in accordance with the Court’s Order of February 11, 2019
17 [ECF 81].

18 Plaintiff’s counsel, together with Plaintiff, have scheduled an in-person
19 settlement conference with the supervisor whom has settlement authority in
20 Washington D.C. on Thursday, May 16, 2019. Plaintiffs would prefer not to
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1 expend the resources to oppose the United States' Motion for Summary Judgment
2 during the two weeks leading up to the in-person settlement conference.
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4 Accordingly, the parties believe good cause exists for this extension to the
5 briefing schedule. The parties stipulate that the current briefing schedule dates be
6 extended with the Opposition by the Plaintiff and Counter Defendant to the United
7 States' Motion for Summary Judgment to be filed by June 12, 2019, and the United
8 States' Reply Brief to be filed by July 12, 2019. The Parties will immediately
9 advise the Court if a settlement is reached.
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13 PANITZ & KOSSOFF, LLP
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16 DATED: May 1, 2019
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/s/Barbara E. Lubin
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23 BARBARA E. LUBIN
24 PANITZ & KOSSOFF, LLP
25 5743 Corsa Avenue, Suite 208
26 Westlake Village, California 91362
27 (805) 379-1667
28 Attorneys for Plaintiffs and
Counterclaim Defendants

22
23 RICHARD E. ZUCKERMAN
24 Principal Deputy Assistant Attorney General

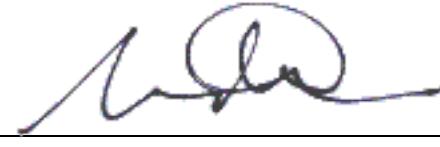
25 DATED: May 1, 2019
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28

/s/Henry C. Darmstadter
HENRY C. DARMSTADTER
Trial Attorney, Tax Division
U.S. Department of Justice

1 P.O. Box 683 Ben Franklin Station
2 Washington, D.C. 20044-0683
3 (202) 307-6481

4 DAYLE ELIESON
5 United States Attorney
6 District of Nevada
Of Counsel

7 IT IS SO ORDERED:

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9 _____
10 MIRANDA M. DU

11 UNITED STATES DISTRICT COURT
12 JUDGE

13 DATED: 5/2/2019

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